

MEMO ENDORSED

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Hon. Alison J. Nathan
United States District Court
Southern District of New York
500 Pearl Street, Room 615
New York, New York 10007

RE: ***British Marine PLC v. Aavanti Shipping & Charterin Ltd., et al.***
Case No. 12-cv-8645

Dear Judge Nathan:

We represent the plaintiff, British Marine PLC ("Plaintiff"), in the above-referenced action against defendants Aavanti Shipping & Chartering Ltd., Anik Industries, Ltd. f/k/a Madhya Pradesh Glychem Industries Ltd., and Ruchi Soya Industries Ltd. We write this letter to respectfully request that a portion of page 8 to Exhibit 1 to the Verified Complaint in Admiralty to this action (the "Complaint") be maintained under seal and filed on the ECF system in its redacted form.

On November 28, 2012, we filed the Complaint which included one exhibit—labeled Exhibit 1. A portion of page 8 to Exhibit 1 contains confidential information which we request be redacted and filed under seal.

We believe our request to be in line with the Second Circuit's holding in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006) which provides for certain documents to be sealed only where "sealing is necessary to preserve higher values and only if the sealing order is narrowly tailored to achieve that aim." *Lugosch*, 435 F.3d at 124. Here, our request to seal is based on the need to ensure that confidential banking information located on a portion of page 8 of Exhibit 1 to the Complaint not be disclosed to the public.

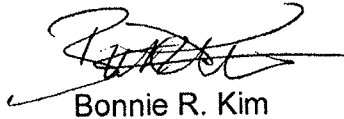
Based on the foregoing, we respectfully request that the Court approve the attached redactions so that the unredacted pages be filed under seal and that Plaintiff be granted its request to file the redacted version of Exhibit 1 to the Complaint on the

ECF system. Accordingly, when the Court orders issuance of the process of maritime attachment and garnishment this action, we request that redacted versions of Exhibit 1 be served on garnishees in this admiralty action.

Pursuant to Your Honor's individual practices, attached please find (1) one full set of Exhibit 1 to the Complaint in highlighted form (i.e., with the phrases to be redacted highlighted); and (2) one partial, loose leaf set of solely the page on which Plaintiff seeks to redact material.

Should you have any questions, please feel free to contact me.

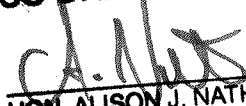
Respectfully submitted,



Bonnie R. Kim

Enclosures

The Complaint may be
docketed with the proposed
redaction to Exhibit I.

SO ORDERED: 11/30/12

HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE